

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA

v.

Criminal No. 2:20-00054

NEDELTCCHO VLADIMIROV

MOTION TO CONTINUE TRIAL AND ALL CASE RELATED ACTION

The defendant, Nedeltcho Vladimirov, by his attorney, Assistant Federal Public Defender Rachel E. Zimarowski, respectfully moves this Court to continue the trial and all case related action in this matter for an additional sixty (60) days. In support thereof, counsel respectfully represents:

1. By Order entered on June 22, 2020, the deadline for the filing of pretrial motions was continued to today, July 20, 2020; the pretrial motions hearing was scheduled for July 27, 2020, at 11:00 a.m.; and, the trial was scheduled for August 17, 2020, at 9:00 a.m. before United States District Court Judge Irene C. Berger in Charleston. Dkt. No. 41.

2. Due to ongoing difficulties associated with the continuing COVID-19 pandemic, including but not limited to locating and interviewing numerous witnesses, the undersigned's ability to both consult with Mr. Vladimirov and conduct necessary investigation into his case continue to be greatly hindered. Additional time is required to complete necessary investigatory tasks and confer with Mr. Vladimirov regarding the same all prior to determining what, if any, pretrial motions need to be filed on his behalf.

3. An additional sixty (60) days is necessary in light of the current circumstances.

4. The undersigned has conferred with Assistant United States Attorney Andrew Tessman and is authorized to state that he does not oppose the requested continuance.

The defendant certifies that the reasons for the request do not include general congestion of the Court's calendar or lack of diligent preparation on the part of the parties involved.

WHEREFORE, for the above-stated reasons, the defendant respectfully requests this Honorable Court enter an order continuing the trial and all case related action in this matter for an additional sixty (60) days.

Date: July 20, 2020.

Respectfully submitted,

NEDELTCCHO VLADIMIROV

By Counsel

WESLEY P. PAGE
FEDERAL PUBLIC DEFENDER

s/Rachel E. Zimarowski

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